

# r.e. wright associates, inc.

#### earth resources consultants

September 22, 1992

Ms. Karen Wolper, Chief Removal Enforcement Section U.S. Environmental Protection Agency Region III 841 Chestnut Building Philadelphia, PA 19107

Re: Progress Report No. 7
Rogers Electric Site
Period 9/13/92 - 9/19/92
REWAI Project M91130

Dear Ms. Wolper:

Pursuant to Sec. VIII, 8.6 of the Administrative Consent Order for the Rogers Electric Site, Docket No. III-91-58-DC, the following provides a progress report for activities performed on behalf of Blake Construction Co., Inc. during the period 9/13/92 through 9/19/92. Additionally, a copy of the progress report submitted by the Defense Reutilization and Marketing Service (DRMS) covering their activities for the same period is attached.

- The following actions have been taken toward achieving compliance with the referenced Consent Order:
  - Most of the remaining laboratory analyses results continue to become available for chip and wipe samples. As more data becomes available, interpretation of the results will facilitate proper waste removal and disposal activities, anticipated to begin during the week of 9/21/92.
  - While awaiting the lab results, REWAI and Clean Harbors personnel continued to catalog site inventory information, coordinate with DLA contractor personnel, and perform analyses results interpretations.
- Data anticipated for the next reporting period includes the remaining laboratory analyses results for chip and wipe sampling that have occurred since August 18, 1992.

Anticipated activities for the following period include the removal of non-contaminated surface debris, cleaning of the UST, staging of contaminated material for removal and disposal, and initiation of the subsurface sampling.

- 3. None anticipated.
- 4. N/A
- 5. N/A
- Analyses results attached.
- 7. DLA negotiated a revised project schedule. See attached memo regarding same.

As always, if you have questions or comments, don't hesitate to call me at (410) 876-0280.

Sincerely,

R. E. WRIGHT ASSOCIATES, INC.

Timolly N. Stardner

Timothy N. Gardner

Project Manager

TNG:blj Attachments

CC: Joseph Phelan, MDE
Bruce Noble, DRMS
John Seymour, Shaw, Pittman, Potts, & Trowbridge
J. C. White, Blake Construction Co.
J. Kuzemchak, Clean Harbors of Baltimore, Inc.
Don Moyer, REWAI
Ned Wehler, REWAI





Page # 1 Sample # 40101-7

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

#### LAB ANALYSIS REPORT

Job Name : Blake/Rogers Elec. Customer PO# : 129485 Job Number : 91130-99-99 Date Sampled : 08/27/92 Location : TY07 Date Received : 08/31/92 Sample State : Wipe Date Completed : 09/10/92 Grab Collector : CHI Discard Date : 09/25/92

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
GAS CHROMATOGRAPH ANALYSES				
PCB WIPE TEST PCB-1016 J -1221 PCB-1232 PCB-1242 PCB-1248 PCB-1254 PCB-1260	N.D. N.D. N.D. N.D. N.D. 260	ug ug ug ug ug ug	200 200 200 200 200 200 200	8080 8080 8080 8080 8080 8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Ian Milnes





Page # 1

Sample # 40101-10

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

### LAB ANALYSIS REPORT

Job Name : Blake/Rogers Elec. Customer PO# : 129485 Job Number : 91130-99-99 Date Sampled : 08/27/92 Date Received : 08/31/92 Location : TY10 Sample State : Wipe Grab Date Completed : 09/10/92 Collector : CHI Discard Date : 09/25/92

RESULT	UNITS	DETECTION LIMIT	METHOD
	8		
N.D.	ug	20	8080
N.D.	ug	20	8080
N.D.	ug	20	8080
N.D.	ug	20	8080
N.D.	ug	20	8080
N.D.	ug	20	8080
43	ug	20	8080
	N.D. N.D. N.D. N.D. N.D.	N.D. ug N.D. ug N.D. ug N.D. ug N.D. ug N.D. ug	N.D. ug 20

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Ian Milnes





Page # 1 Sample # 40102-1

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

### LAB ANALYSIS REPORT

Job Name : Blake/Rogers Elec. Customer PO# : 129485 Job Number : 91130-99-99 Date Sampled : 08/27/92 Location : TY11 Date Received : 08/31/92 Date Completed : 09/10/92 Sample State : Wipe Grab Collector : CHI Discard Date : 09/25/92

		(4)	DETECTION	
TEST/PARAMETER	RESULT	UNITS	LIMIT	METHOD
GAS CHROMATOGRAPH ANALYSES				
PCB WIPE TEST			*	
`B-1016	N.D.	ug	100	8080
'. CB-1221	N.D.	ug	100	8080
PCB-1232	N.D.	ug	100	8080
PCB-1242	N.D.	ug	100	8080
PCB-1248	N.D.	ug	100	8080
PCB-1254	N.D.	ug	100	8080
PCB-1260	115	ug	100	8080

N.D. - Not Detected

Respectfully Submitted,
WRIGHT LAB SERVICES

Ian Milnes



ORIGINAL Red)

Page # 1 Sample # 39967-4

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

### LAB ANALYSIS REPORT

Job Name : Blake/Rogers Elec. Customer PO# : 129485 Job Number : 91130-99-99 Date Sampled : 08/25/92 Location : G-013 Date Received : 08/27/92 Sample State : Wipe Composite Date Completed : 09/10/92 Collector : CHI Discard Date : 09/25/92

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
GAS CHROMATOGRAPH ANALYSES				
PCB WIPE TEST	×		12:	
B-1016	N.D.	ug	500	8080
_B-1221	N.D.	ug	500	8080
PCB-1232	N.D.	ug	500	8080
PCB-1242	N.D.	ug	500	8080
PCB-1248	N.D.	ug	500	8080
PCB-1254	N.D.	ug	500	8080
PCB-1260	1100	ug	500	8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Tan Milnes





Page # 1 Sample # 39968-6

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

### LAB ANALYSIS REPORT

Job Name : Blake/Rogers Elec. Customer PO# : 129485 Job Number : 91130-99-99 Date Sampled Location : SC1-048 Date Received : 08/27/92 Sample State : Wipe Grab Date Completed: 09/10/92 Collector : CHI Discard Date : 09/25/92

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
GAS CHROMATOGRAPH ANALYSES				
PCB WIPE TEST			ž 8	
- B-1016	N.D.	ug	10	8080
. ∠B-1221	N.D.	ug	10	. 8080
PCB-1232	N.D.	ug	10	8080
PCB-1242	N.D.	ug	10	8080
PCB-1248	32	ug	10	8080
PCB-1254	N.D.	ug	10	8080
PCB-1260	57	ug	10	8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Tan Milnes





Page # 1 Sample # 39970-2

DEMECRITON

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

### LAB ANALYSIS REPORT

Customer PO# : 129485 Job Name : Blake/Rogers Elec. Job Number : 91130-99-99 Date Sampled : 08/26/92 : SC1-053 Location Date Received : 08/27/92 Sample State : Wipe Composite Date Completed : 09/10/92 Collector : CHI Discard Date : 09/25/92

TEST/PARAMETER	RESULT	UNITS	LIMIT	METHOD
GAS CHROMATOGRAPH ANALYSES				
PCB WIPE TEST			(*)	
B-1016	N.D.	ug	100	8080
. CB-1221	N.D.	ug	100	8080
PCB-1232	N.D.	ug	100	8080
PCB-1242	N.D.	ug	100	8080
PCB-1248	N.D.	ug	100	8080
PCB-1254	N.D.	ug	100	8080
PCB-1260	200	ug	100	8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Ian Milnes



Page # 1 Sample # 39970-4

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ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

### LAB ANALYSIS REPORT

Customer PO# : 129485 Job Name : Blake/Rogers Elec. Job Number : 91130-99-99 : 08/26/92 Date Sampled Location : SC1-041 Date Received : 08/27/92 Sample State : Wipe Grab Date Completed : 09/10/92 Collector : CHI Discard Date : 09/25/92

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
CAC CURONAMOCRARU ANALVORO				
GAS CHROMATOGRAPH ANALYSES		•	320	
PCB WIPE TEST				
B-1016	N.D.	ug	50	8080
. ∪B-1221	N.D.	ug	50	8080
PCB-1232	N.D.	ug	50	8080
PCB-1242	N.D.	ug	50	8080
PCB-1248	N.D.	ug	50	8080
PCB-1254	N.D.	ug	50	8080
PCB-1260	74	ug	50	8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Tan Milnes





Page # 1 Sample # 39971-6

DETECTION

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

### LAB ANALYSIS REPORT

: Blake/Rogers Elec. Customer PO# : 129485 Job Name Date Sampled Job Number : 91130-99-99 : 08/26/92 Location : SC1-019 Date Received : 08/27/92 Sample State : Wipe Composite Date Completed: 09/10/92 Discard Date Collector CHI : 09/25/92

TEST/PARAMETER	RESULT	UNITS	LIMIT	METHOD
GAS CHROMATOGRAPH ANALYSES				
PCB WIPE TEST			•	
B-1016	N.D.	ug	200	8080
. UB-1221	N.D.	ug	200	8080
PCB-1232	N.D.	ug	200	8080
PCB-1242	N.D.	ug	200	8080
PCB-1248	N.D.	ug	200	8080
PCB-1254	N.D.	ug	200	8080
PCB-1260	320	ug	200	8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Ian Milnes



Page # 1

Sample # 39866-7

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

#### LAB ANALYSIS REPORT

Job Name : Blake/Rogers Elec. Customer PO#

Job Number : 91130-99-99
Location : SC3-08B Date Sampled : 08/24/92 Date Received : 08/25/92 Date Sampled

Sample State : Wipe Composite Date Completed: 09/13/92 Collector : KB & CHI Discard Date : 09/28/92

DETECTION TEST/PARAMETER RESULT UNITS LIMIT METHOD GAS CHROMATOGRAPH ANALYSES PCB WIPE TEST B-1016

N.D. ug 10 8080 -B-1221 N.D. ug 10 8080 PCB-1232 N.D. ug 10 8080 PCB-1242 N.D. ug 10 8080 PCB-1248 N.D. ug 10 8080 PCB-1254 N.D. ug 10 8080 PCB-1260 N.D. uq 10 8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Tan Milnes





Page # 1 Sample # 39867-3

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

### LAB ANALYSIS REPORT

Job Name : Blake/Rogers Elec. Customer PO# Job Number : 91130-99-99 Date Sampled : 08/24/92 Location : SC3-15B Date Received : 08/25/92 Sample State : Wipe Date Completed : 09/11/92 Composite Collector : KB & CHI Discard Date : 09/26/92

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
GAS CHROMATOGRAPH ANALYSES				
PCB WIPE TEST	and the second		*	27
B-1016	N.D.	ug	2500	8080
ı ∪B-1221	N.D.	ug	2500	8080
PCB-1232	N.D.	ug	2500	8080
PCB-1242	N.D.	ug	2500	8080
PCB-1248	N.D.	ug	2500	8080
PCB-1254	N.D.	ug	2500	8080
PCB-1260	3800	uq	2500	8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Tan Milnes





Page # 1 Sample # 39867-9

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

### LAB ANALYSIS REPORT

Job Name : Blake/Rogers Elec. Customer PO# :

Job Number : 91130-99-99 Date Sampled : 08/24/92

Location : SC3-23A Date Received : 08/25/92

Sample State : Wipe Composite Date Completed : 09/13/92

Collector : KB & CHI Discard Date : 09/28/92

DETECTION TEST/PARAMETER UNITS LIMIT GAS CHROMATOGRAPH ANALYSES PCB WIPE TEST 3-1016 N.D. ug 10 8080 F-B-1221 N.D. ug 10 8080 PCB-1232 N.D. 10 uq 8080 PCB-1242 N.D. ug 10 8080 PCB-1248 N.D. ug 10 . 8080 PCB-1254 N.D. 10 ug 8080 PCB-1260 N.D. 10 ug 8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Ian Milnes





Page # 1 Sample # 39702-3

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster MD 21157

September 14, 1992

#### LAB ANALYSIS REPORT

: 12945 Customer PO# Job Name : Blake/Rogers Elec. Date Sampled : 08/19/92
Date Received : 08/20/92 Job Number : 91130-99-99 Location : DC 01 / Drum Crusher Date Completed : 09/10/92 Sample State : Wipe Grab Discard Date : 09/25/92 Collector : KB &

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
GAS CHROMATOGRAPH ANALYSES			w.	
PCB WIPE TEST 3-1016 PCB-1221 PCB-1232 PCB-1242 PCB-1248 PCB-1254 PCB-1260	N.D. N.D. N.D. N.D. N.D. N.D.	ug ug ug ug ug ug	20 20 20 20 20 20 20	8080 8080 8080 8080 8080 8080

N.D. - Not Detected

Detection level was raised due to sample matrix interferences.

Respectfully Submitted, WRIGHT LAB SERVICES

Ian Milnes





Page # 1 Sample # 39702-4

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

### LAB ANALYSIS REPORT

Job Name : Blake/Rogers Elec. Customer PO# : 12945

Job Number : 91130-99-99 Date Sampled : 08/19/92

Location : DHF 01 / Drum Handler Date Received : 08/20/92

Sample State : Wipe Grab Date Completed : 09/11/92

Collector : KB & SR Discard Date : 09/26/92

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
GAS CHROMATOGRAPH ANALYSES				8
PCB WIPE TEST			×I	
B-1016	N.D.	ug	50	8080
1 -B-1221	N.D.	uģ	50	8080
PCB-1232	N.D.	ug	50	8080
PCB-1242	N.D.	ug	50	8080
PCB-1248	58	ug	50	8080
PCB-1254	N.D.	ug	50	8080
PCB-1260	65	ug	50	8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Ian Milnes





Page # 1 Sample # 39791-2

ATTN: Tim Gardner

R. E. Wright Associates Inc. 125 Airport Drive, Suite 36

Gateway West

Westminster

MD 21157

September 14, 1992

#### LAB ANALYSIS REPORT

Job Name : Blake/Rogers Elec. Customer PO# : 129485

Job Number : 91130-99-99 Date Sampled : 08/20/92

Location : PUT-01F Date Received : 08/21/92

Wipe Bed / Comp 4

Sample State: Wipe Grab Date Completed: 09/13/92 Collector: CHI Discard Date: 09/28/92

TEST/PARAMETER	RESULT	UNITS	DETECTION LIMIT	METHOD
GAS CHROMATOGRAPH ANALYSES				
B WIPE TEST		50		
r ∪B-1016	N.D.	ug	10	8080
PCB-1221	N.D.	ug	10	8080
PCB-1232	N.D.	ug	10	8080
PCB-1242	N.D.	ug	10	8080
PCB-1248	N.D.	ug	10	8080
PCB-1254	N.D.	ug	10	8080
PCB-1260	N.D.	ug	10	8080

N.D. - Not Detected

Respectfully Submitted, WRIGHT LAB SERVICES

Ian Milnes

18 Sep 92

Mr. Timothy Gardner Project Manager R.F. Wright Associates, Inc. 125 Airport Drive, Suite 36 Westminster, Maryland 21157

Dear Mr. Gardner:

Re: Remedial Action Rogers Electric Site Cheverly, Maryland

Pouce Nobe

In accordance with Administrative Order of Consent (Consent Order), Docket Number III-91-58-DC, we have enclosed Progress Report No. 5 covering the period September 13, 1992 to September 19, 1992.

Please contact us should you require further information and clarification.

Yours truly,

Bruce Noble

Environmental Protection Specialist Defense Reutilization and Marketing Service Battle Creek, Michigan (616) 961-7412

PROGRESS REPORT NO. 7 REMEDIAL ACTION ROGERS ELECTRIC SITE CHEVERLY MARYLAND

PERIOD: SEPTEMBER 13, 1992 TO SEPTEMBER 19, 1992

This progress report is submitted pursuant to the requirements of the Administrative Order of Consent (Consent Order) Docket Number III-91-58-DC. For ease of reporting, activities are segregated into activities undertaken, data produced, submittals completed and activities scheduled for the project.

#### A. WORK COMPLETED

- a) Activities Undertaken or Completed This Reporting Period

  The following discussion summarizes activities undertaken
  during this reporting period:
  - \* Testing contractor of Spotts, Stevens and McCoy, Inc., is doing all analytical work on samples taken from the site.
- b) Data Produced This Reporting Period

  The following data were produced during this reporting
  - \* Testing contractor of Spotts, Stevens and McCoy, Inc., to complete all analytical work and submit final report to DLA/DRMS by 5 Oct 92.
- c) Submittals Completed This Reporting Period The following data was submitted during this reporting period:
  - \* DLA/DRMS sent letter to EFA Region III, Ms. Karen Wolper on 11 Sep 92 concerning changes in the work plan (Enclose).

- d) Activities Scheduled For Next Reporting Period Activities planned for the next reporting period are detailed as follows:
  - \* Testing contractor of Spotts, Stevens and McCoy, Inc., to continue to due analytical work on samples taken from the site.

Respectfully submitted.

Burn Noble

DEFENSE REUTILIZATION AND MARKETING SERVICE

BRUCE NOBLE

Environmental Protection Specialist

DRMS-SHP

11 1 SEP 1992

DRMS-SHP (8. Noble/(AV)932-7412/(FAX)(616)061-5841/ven)
DDN E-MAIL: drms-sh@drms.dla.mil

SUBJECT: Changes in the Work Plan for the Rogers Electric Site, Cheverly, MD

Ms. Karen Wolper, Chief Removal Enforcement Section U.S. Environmental Protection Agency Region III 841 Chestnut Building Philadelphia, PA 19107

Dear Ms. Wolper:

DEF 41 JL 10. --

Reference: Telephone conservation between Mr. Bruce Noble, DRMS-SHP, and Ms. Karen Wolper, USEPA, 31 Aug 92, subject as above.

In referenced conversation, you verbally approved changes in the work plan. You also requested that DRMS follow up with these changes in writing to stay in compliance with the Administrative Consent Order, Docket No. III-91-58-DC.

Under the work plan schedule, all sampling and analytical work was to have been completed by 1 Sep 92. All sampling was completed 2 Sep 92. However, because of the number of samples and the terms and conditions under this DoD contract, analytical work does not have to be completed for 30 days which is 5 Oct 92.

Under the work plan schedule all removals were to have been completed by 22 Sep 92. DRMS cannot remove the drums, transformers and welder cores until we receive the analytical work. DRMS will issue a modification and delivery order for the removals as soon as we receive the analytical work. Under the terms and conditions of our disposal contracts, the contractor has 30 days to pick up the property. Therefore, DRMS will have the removal completed on or about 30 Nov 92.

DRMS is also going to have our contractor take wipe samples for PCBs on the welder cores. In the current work plan the welder cores were to have to been assumed to be over 500 ppm PCB. DRMS will use the analytical work from the wipe samples to determine the PCB levels.

ORMS-SHP PAGE 2
SUBJECT: Changes in the Work Plan for the Rogers Electric Site,
Cheverly, MD

ORMS has determined it will be beneficial for all parties at the site to store the sampled drums in the concrete bermed pad which is within the site and directly to the west of the garage. Originally, under the work plan, the drums were to have been placed in temporary storage in the seavans and garage. Storing the drums in the concrete pad will allow more secure storage and allow the removal of the seavans. All drums stored in concrete bermed pads will have plastic placed over and underneath them to prevent spillage and infiltration of rainwater.

Overall, the work at the Rogers Electric site is progressing smoothly. The above changes to work plan will not adversely affect the eventual cleanup of the site.

Sincerely,

## SIGNED THOMAS H. FRENT

J. W. EGGENBERGER
Director, Directorate of
Disposal Management and
Environmental Protection